

## **TO THE PUBLIC AND RESIDENTS OF VERNAL CITY:**

Notice is hereby given that the **VERNAL CITY PLANNING COMMISSION** and **ECONOMIC OPPORTUNITY ADVISORY BOARD** will hold a regular meeting on **Tuesday, January 10, 2023 at 7:00 p.m.** in the Vernal City Council Chambers at 374 East Main Street, Vernal, Utah.

# **AGENDA**

### **A. STANDING BUSINESS**

1. Welcome and Designation of Chair and Members
2. Approval of Meeting Minutes for December 13, 2022

### **B. PUBLIC HEARING – 7:05**

1. Recommendation to consider amending the Vernal City General Plan- Appendix E, Low to Moderate Income Housing.

### **C. ACTION ITEM**

1. Recommendation to consider amending the Vernal City General Plan – Appendix E, Future Land Map

### **D. ADJOURN**

# MINUTES of the Vernal City PLANNING COMMISSION

Vernal City Council Chambers - 374 East Main Street, Vernal, Utah

December 13, 2022

7:00 pm

**Members Present:** Brandon Parker, Stephen Lytle, Brian Eades and Corey Foley

**Members Excused:** Kimball Glazier and Troy Allred

**Alternates Present:**

**Alternates Excused:** Randal Mills

**Staff Present:** Allen Parker, Assistant City Manager; and Tracie Smith, Administrative Clerk.

**WELCOME AND DESIGNATION OF CHAIR AND MEMBERS:** Chair Brandon Parker welcomed everyone present to the meeting.

**APPROVAL OF MINUTES FROM November 8, 2022:** Chair Brandon Parker asked if there were any changes to the minutes from November 8, 2022. There being two corrections, *Brandon Parker moved to approve the minutes of November 8, 2022 after corrections. Stephen Lytle seconded the motion. The motion passed with Brandon Parker, Stephen Lytle, Brian Eades and Corey Foley voting in favor.*

**RECOMMENDATION TO CONSIDER CHANGES TO THE CODES REGULATING OVERSIZED TRAILERS AND TRAVEL TRAILERS, SECTIONS 16.04.470, 16.04.710, 16.04.428, DEFINITIONS, – 16.24.152, OVERSIZED TRAILERS & TRAVEL TRAILERS, ADDING NEW SECTIONS 12.04.261, 12.04.262 AND 12.04.263, DEFINITIONS AND STORAGE OF COMMERCIAL VEHICLES IN RESIDENTIAL ZONES - ORDINANCE NO. 2023-01**

Allen Parker presented the ordinance that was created by the City Attorney. He recommended that the section of the code pertaining to oversized travel trailers be moved to a location more easily found for those charged with enforcing that part of the code and modifying what remained of the original section. He recounted the part of section 16.04.428 that defined obstructing visibility as a trailer sixteen (16) feet or longer and eight (8) feet or wider. Next he discussed the section which splits out travel trailer or camper from oversized trailer. Corey Foley suggested that something needs to be added to the code stating that the slide out cannot exceed eight (8) feet wide and cannot proceed into the streets. Mr. Parker agreed with Mr. Foley and added that where on-street parking is allowed, slide outs should not extend over the sidewalks. Mr. Foley expressed his concerns over waste water being discharged unlawfully while parked in a back yard and wondered how we go about looking into a back yard. Mr. Parker answered that the City had a number of enforcements regarding living in a trailer in a back yard and it is hard for individuals to deny living there.

**Vernal City Planning Commission Minutes**  
**December 13, 2022**

Chair Brandon Parker opened the public hearing to receive comments from the public.

Gabby Hawkes Blackburn, 130 East 500 North in Vernal, introduced herself and asked about living in the travel trailer while building a home. Mr. Parker answered that a caretaker is allowed on commercial sites if needed while building, but he is not aware if that applied to all people or situations. Ms. Hawkes Blackburn pointed out that the County had dealt with the situation by requiring the builders to have an active building permit and to make progress every four (4) months. Mr. Parker stated that this was passed in about 2007 to allow for visitors from out of town stay for a short term visit for a funeral etc., however, the City did not want man camps in back yards, which was an issue in the past. Mr. Parker also stated that the City had been enforcing this code for at least twelve (12) years. Chair, Brandon Parker expressed concerns about too many restrictions for property owners. Mr. Parker pointed out that one reason for this code is visibility and that pushing everything back ten (10) feet from the edge of the property is in the best interest of the public. Commissioner Parker stated that the ten (10) feet was too long in his opinion. Mr. Foley asked what the difference was between a travel trailer and oil field worker leaving a work truck on the street for seven (7) days with no distance and blocking views.

Jenny Thompson, 54 West 200 North in Vernal, stated that her first concern was not having a full time code enforcement employee. She noted that it seemed the City spent a lot of money on entertainment and she felt it was not a role of government to entertain. She would like to see the money go to code enforcement and also law enforcement. She went on to explain that as a pedestrian she had a close call while walking and not being seen, because of the trailer blocking the view from oncoming traffic. She felt that travel trailers need to be parked back a good distance to make it safe for pedestrians. She wanted to know why campers could not be occupied on a property and stated that she is big on property rights.

Gabby Hawkes Blackburn spoke about Uintah County having certain zones with use permit to regulate utilities and prevent dumping sewage on property. Ms. Hawkes Blackburn asked if the Code could be amended to include vehicles. Mr. Parker stated that the City would need funding for a full time or another part time Code Enforcement Officer so the officer could better observe and enforce the Code.

Chair, Brandon Parker closed the public hearing.

Stephen Lytle moved to have zero (0) foot setbacks from property line. There being no second, the motion died.

***Brian Eades moved to forward a positive recommendation as presented to the City Council to amend the Vernal City Municipal Planning and Zoning Code to consider changes to the Code to consider changes to the codes regulating oversized trailers and travel trailers, sections 16.04.470, 16.04.710, 16.04.428, definitions, – 16.24.152, oversized trailers & travel trailers, adding new sections 12.04.261, 12.04.262 and 12.04.263, definitions and storage of commercial vehicles in residential zones - Ordinance No. 2023-01 Corey Foley seconded the motion. The motion passed with Brandon Parker, Corey Foley, Brian Eades and Stephen Lytle voting in favor.***

**RECOMMENDATION TO CONSIDER AMENDING THE VERNAL CITY MUNICIPAL PLANNING AND ZONING CODE TO CONSIDER CHANGES TO THE CODES REGULATING R-4 PARKING, SECTION 16.27.070 MINIMUM AREA REQUIREMENTS, AND SECTION 16.26.120 PARKING SPACE REQUIREMENTS – ORDINANCE 2023-02**

Allen Parker addressed an issue in the Code that took place many years ago in regards to parking and multifamily developments. With oil field hands living together there was a need for more parking for trailers and additional vehicles. The impact was greater as the density increased in the R-4 zone. Mr. Parker brought up that it might be better to reduce the requirement from twenty (20) percent to thirty (30) percent, which would offset some of the demands and would be more comparable to the R-3 zone. Mr. Parker went on to state that the Row House zone and MX zone does not match. Mr. Parker suggested splitting the difference with lower and higher density development zones and he did not want to create a burden on certain types of developments.

Chair, Brandon Parker, opened the public hearing to receive comment from the public.

There being no further public comment, Chair, Brandon Parker, closed the public hearing.

There was a discussion about what percentage of space should be allowed for parking in multifamily dwellings and mixed use zones as well as green space for children and pets.

*Stephen Lytle moved to forward a positive recommendation as presented to the City Council to amend the Vernal City Municipal Planning and Zoning Code to consider amending the Vernal City Municipal Planning and Zoning Code to consider changes to the codes regulating R-4 parking, section 16.27.070 Minimum Area Requirements, and Section 16.26.120 Parking Space Requirements – Ordinance 2023-02 Brian Eades seconded the motion. The motion passed with Brandon Parker, Brian Eades, Corey Foley and Stephen Lytle voting in favor.*

**PLANNING COMMISSION MEETING SCHEDULE FOR THE 2023 YEAR**

Allen Parker reminded the committee that annually the City recommends to the City Council in the form of a resolution, to set the date and times for the monthly Planning Commission meetings.

*Brandon Parker moved to forward a positive recommendation to the City Council to leave the times at 7pm the second Tuesday of every month for the Planning Commission 2023 meeting schedule. Brian Eades seconded the motion. The motion passed with Brandon Parker, Brian Eades, Corey Foley and Stephen Lytle voting in favor.*

Mr. Parker introduced Gabrielle Hawkes Blackburn as the Assistant City Manager and Planning Director and stated that she would be starting 28<sup>th</sup> of December 2022 replacing Mr. Parker in his position.

# Vernal City

January 10, 2022

## Planning Commission

7:00 pm City Hall

### AGENDA

#### A. STANDING BUSINESS

1. Welcome and Designation of Chair and Members
2. Approval of Meeting Minutes for December 13, 2022

#### B. PUBLIC HEARING - 7:05

1. Recommendation to consider amending the Vernal City General Plan on Low to Moderate Income Housing.
2. Recommendation to consider amend the Vernal City General Plan - Appendix E, Future Land Map

#### C. ADJOURN

**Notes:** \_\_\_\_\_

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## Low to Moderate Income Housing Plan

Reference: Utah State Code 10.9a.403

*\*just FYI no need to read all of this\**

- (iii) for a specified municipality as defined in Section 10-9a-408, a moderate income housing element that:
  - (A) provides a realistic opportunity to meet the need for additional moderate income housing within the next five years;
  - (B) selects three or more moderate income housing strategies described in Subsection (2)(b)(iii) for implementation, including one additional moderate income housing strategy as provided in Subsection (2)(b)(iv) for a specified municipality that has a fixed guideway public transit station; and
  - (C) includes an implementation plan as provided in Subsection (2)(c); and
- (b) In drafting the moderate income housing element, the planning commission:
  - (i) shall consider the Legislature's determination that municipalities shall facilitate a reasonable opportunity for a variety of housing, including moderate income housing:
    - (A) to meet the needs of people of various income levels living, working, or desiring to live or work in the community; and
    - (B) to allow people with various incomes to benefit from and fully participate in all aspects of neighborhood and community life;
- (iii) for a town, may include, and for other municipalities, shall include, a recommendation to implement three or more of the following moderate income housing strategies:
  - (A) rezone for densities necessary to facilitate the production of moderate income housing;
  - (B) demonstrate investment in the rehabilitation or expansion of infrastructure that facilitates the construction of moderate income housing;
  - (C) demonstrate investment in the rehabilitation of existing uninhabitable housing stock into moderate income housing;
  - (D) identify and utilize general fund subsidies or other sources of revenue to waive construction related fees that are otherwise generally imposed by the municipality for the construction or rehabilitation of moderate income housing;
  - (E) create or allow for, and reduce regulations related to, internal or detached accessory dwelling units in residential zones;
  - (F) zone or rezone for higher density or moderate income residential development in commercial or mixed-use zones near major transit investment corridors, commercial centers, or employment centers;
  - (G) amend land use regulations to allow for higher density or new moderate income residential development in commercial or mixed-use zones near major transit investment corridors;
  - (H) amend land use regulations to eliminate or reduce parking requirements for residential development where a resident is less likely to rely on the resident's own vehicle, such as residential development near major transit investment corridors or senior living facilities;
  - (I) amend land use regulations to allow for single room occupancy developments;
  - (J) implement zoning incentives for moderate income units in new developments;
  - (K) preserve existing and new moderate income housing and subsidized units by utilizing a landlord incentive program, providing for deed restricted units through a grant program, or, notwithstanding Section 10-9a-535, establishing a housing loss mitigation fund;
  - (L) reduce, waive, or eliminate impact fees related to moderate income housing;

ECT... through X

- (c) (i) In drafting the implementation plan portion of the moderate income housing element as described in Subsection (2)(a)(iii) (C), the planning commission shall establish a timeline for implementing each of the moderate income housing strategies selected by the municipality for implementation.
- (ii) The timeline described in Subsection (2)(c)(i) shall:
  - (A) identify specific measures and benchmarks for implementing each moderate income housing strategy selected by the municipality, whether one-time or ongoing; and
  - (B) provide flexibility for the municipality to make adjustments as needed.

## SECTION 6

*\*Most of this already approved\**

### IMPLEMENTATION STRATEGY

#### Gaps Analysis

Vernal City has established the following housing gaps (listed by priority) to help address the need for workforce housing:

- 1) Rental workforce housing for families making less than 50% of AMI (\$36,666 for a family of 4) with higher densities.
  - a. 40 units annually
  - b. Location: Downtown redevelopment or infill in Vernal City near employment centers, shopping, medical care and public transportation
- 2) Rental workforce housing for families with incomes less than 80% of AMI (\$58,666 for a family of 4).
  - a. 40 units annually
  - b. Location: Downtown redevelopment or infill in Vernal City near employment centers, shopping, medical care and public transportation
- 3) Workforce Housing for families at 80% or less of AMI focusing on single family homes to purchase including condominiums and townhomes in the form of duplexes or larger, higher density properties. The city should also act to identify locations for "self-help" housing developments and CROWN Homes in consultation with the Uintah Basin Association of Governments and the Uintah Basin Assistance Council.
  - a. 15 units annually
- 4) Lower cost, subsidized, rental property for persons with special needs.
  - a. Elderly housing for persons on fixed incomes
    - i. 20 units per year, based on the aging of the population
  - b. Accessible rental housing for persons with disabilities including physical and mental disabilities and with incomes below 50% of AMI, separate or as part of all other rental housing that is approved.
    - i. Units Annually (Based on the Federal Low-Income Housing Tax Credit development that requires a 5% set-aside for accessibility in all new projects, see 1 and 2 above)
  - c. 10 additional shelter units and 20 units of transitional housing for victims suffering from domestic abuse.
- 5) Housing for the homeless (including youth aging out of foster care and persons coming out of incarceration)
  - a. 6 units of additional housing for the homeless
  - b. within two years, with full supportive services funded.
  - c. 2 units of transitional housing for youth aging out of foster care (3-year goal)
  - d. 2 units of transitional housing for persons exiting incarceration (5-year goal)
- 6) Workforce Housing for families at 120% or less of AMI focusing on single family homes to purchase including condominiums and town homes in the form of duplexes or larger higher density properties.
  - a. 10 Units Annually
- 7) Workforce Housing for families at 80% or less of AMI focusing on multifamily housing for rent in the form of duplexes or higher density properties.
  - a. 20 Units Annually
- 8) Credit Counseling program needs to be enhanced through Utah State University, Uintah Basin Association of Governments and other professional counseling agencies such as Triple AAA Fair Credit. Credit management should be taught in conjunction with long-term financial management courses; they should particularly be made available to help

*\*Most of this already approved\**

especially single males and single female heads of households. Additional educational planning should occur:

- a. long term wealth management
  - b. benefits of homeownership
  - c. preparation for homeownership including debt and credit management; incentives for attending these training sessions will be provided
- 9) Creating housing solutions in partnership with major employers, especially those in the oil and gas industry. Vernal City/Uintah County should create a "Blue Ribbon Housing Task Force" to create housing solutions for the workers struggling to find housing and who are currently living in motel rooms. The members of the task force should include employers, housing providers, the real estate industry, mortgage lenders, landlords, city and county leaders, and citizen mentors. This task force will likely be created in mid-2009 and will meet monthly for the first six months of the year. A report with goals, objectives, and outcomes will be developed along with an implementation strategy containing milestones and assignments made with accountability monthly through the end of 2009. Solutions, goals, and objectives will be realized during the year.

**Preferred Locations for Priority Housing:** Vernal City prefers to develop higher density rental housing in downtown infill sites first due to the proximity of the sites to employment centers, services and health care. It is understood that the downtown properties will be relatively expensive, but that optimal location is critical for the long-term success of particularly higher density rental properties. Vernal City will create appropriate zoning in these locations to facilitate preferred housing in these locations.

**Redevelopment:** Vernal City will work toward redeveloping or revitalizing areas of the city that are important, that currently are underutilized, that have deteriorated, or which have unsightly/antiquated housing or commercial development.

- 1) Current mobile home development on 5<sup>th</sup> East and 200 North
- 2) Older, downtown area in central Vernal area, focusing on older housing stock

**Locations near educational centers:** The new Utah State University Campus location will require public acquisition of real property, some of which will be utilized for the development of affordable workforce housing at the university and for other employers in the area.

**Single family, homeownership development sites:** Locations will be identified where opportunities can be developed. Housing that will be facilitated with city involvement will be housing for lower income homebuyers in the 50% to 80% of AMI range. This housing would include UHF Crown homes, Rural Development Self-Help Homeownership homes and other subsidized homeownership programs. Other moderate-income single-family housing for purchase includes townhomes and condominiums including potential conversions.

- 1) Area around Vernal Middle School
- 2) Infill projects in the older area of Vernal City some with zoning issues that need to be resolved
- 3) Identify new targeted neighborhoods with deteriorated housing by conducting a survey of housing quality

**Infill analysis of existing undeveloped lots and vacant or dilapidated housing:** Location analysis of possible appropriate sites for development including vacant lots will be conducted by the city. Initial priority will be undeveloped lots included in this plan, and include the following:

- 1) Vacant lot at 100 South 300 East
- 2) Vacant lot at 375 So. 100 E.



\*Everything in yellow is  
IMPORTANT\*

3) Properties being foreclosed or are vacant.

- a. There are 19 foreclosures underway in Uintah Co. and there are 13 bank-owned properties in the Ashley Valley area and a 132 unit foreclosed subdivision as previously referenced.

**Rezone:** Rezone for densities necessary to facilitate the production of moderate income housing.

- Vernal City will facilitate the rezone of a minimum of one (1) property rezoned to the Mixed Use zone every 18 months.
- Vernal City will facilitate the rezone of a minimum of one (1) property rezoned higher residential zoning at a minimum of every 18 months.

**Upgrade Infrastructure:** Demonstrate investment in the rehabilitation or expansion of infrastructure that facilitates the construction of moderate income housing.

- Vernal City would like to accomplish one (1) major water line within the 2023 year to facilitate higher density residential on Main Street.
- Vernal City would like to accomplish (1) major sewer line within the 2023 year to facilitate higher density residential on Main Street.

**Internal Additional Dwelling Units:** Create or allow for, and reduce regulations related to, internal or detached accessory dwelling units in residential zones.

- Vernal City will create an application for the addition of IADU's In the zones IADU's are allowed in within the 2023 year.
- Vernal City will create an internal process for the tracking of existing IADU's In the zones IADU's are allowed in within the 2023 year.

**Update Parking Ordinance:** Amend land use regulations to eliminate or reduce parking requirements for residential development where a resident is less likely to rely on the resident's own vehicle, such as residential development near major transit investment corridors or senior living facilities.

- Vernal city will amend the parking ordinance in MX zone to reduce its parking liability to 1.5 per dwelling unit by December 2022.
- Vernal City will amend the parking ordinance for the R4 zone to facilitate lower parking requirements for residential development near public transit or walkable amenities by July 2024.

**Utilize Community Reinvestment Agency (CRA) Moderate Housing Funds:** Demonstrate utilization of a moderate income housing set aside from a community reinvestment agency, redevelopment agency, or community development and renewal agency to create or subsidize moderate income housing.

- Research best practices for housing above shops within CRA to serve students and seniors in the next year and a half.
- 10% of CRA money to be used for Affordable housing per state code after CRA reaches \$100,000 or within 2 years

An analysis will be performed by Vernal City to determine a priority of foreclosed properties and other dilapidated housing that will be prioritized for acquisition/rehabilitation in conjunction with the Uintah Basin Association of Governments and other developers as appropriate based on property size and location. ADD TIMELINE




## Analysis


 = New Sections

 = Language required by state


● = Timelines added by staff

 **Rezone:** Rezone for densities necessary to facilitate the production of moderate income housing.


- Vernal City will facilitate the rezone of a minimum of one (1) property rezoned to the Mixed Use zone every 18 months.
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- Research best practices for housing above shops within CRA to serve students and seniors in the next year and a half.
- 10% of CRA money to be used for Affordable housing per state code after CRA reaches \$100,000 or within 2 years

## **Amend the Future Land Map**

Last Seen Tuesday January 3rd, 2023 at a Work Session

*\*just FYI no need to read  
all of this\**

### **Vernal City Annexation Policy Plan**

Vernal City encourages orderly residential, commercial, industrial and recreational growth and development and will continue to identify areas within the community appropriate for these uses. Development will be allowed to continue in a responsible manner and in locations that will contribute to the economic and social well-being of area residents. Vernal City planning personnel will continue to work with Uintah County and neighboring communities to coordinate planning activities and address land uses along jurisdictional boundaries. To ensure that adequate services can be provided to community residents, Vernal City will cooperate and coordinate with Uintah County and neighboring communities in the planning and implementation of all new services and infrastructure improvements.

As growth continues in the Ashley Valley, the Vernal City Council will have to address new annexation issues. This Annexation Policy Plan is drafted as an instrument to help the Vernal City Council in address these issues.

#### **Expansion Area Map**

The Vernal City planning staff has prepared an Expansion Area Map. This map is an important component of the Policy Plan. The Expansion Area Map identifies those areas that Vernal City would be willing to consider for annexation. In accordance with State Statutes, the map will identify and help eliminate any "islands" or "peninsulas" of unincorporated areas. It is the desire of Vernal City create linear, square boundaries to eliminate jurisdictional confusion. These areas are identified on the map. The map will be attached with this plan and will be adopted by the Vernal City Council in a public meeting.

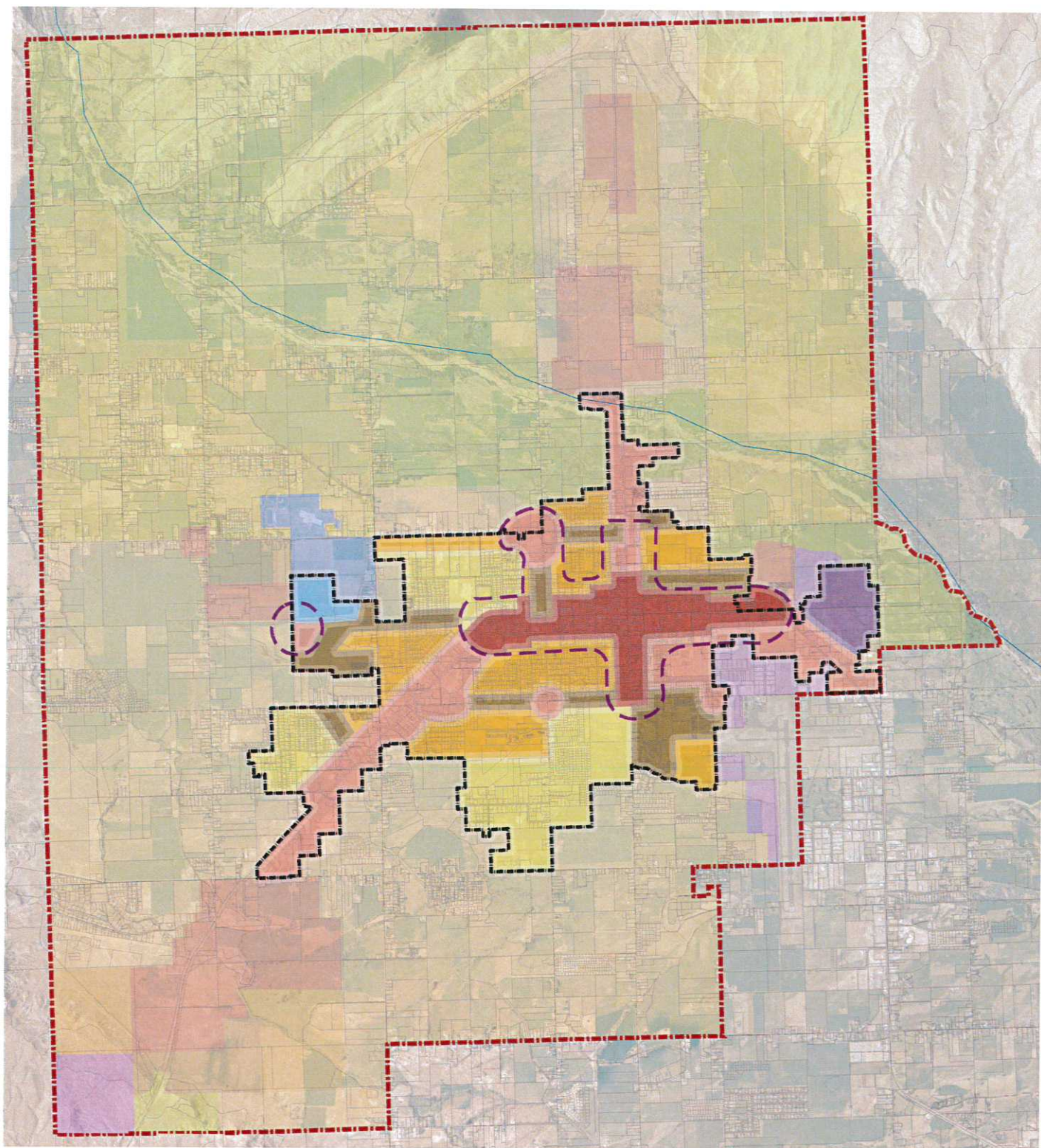
#### **Annexation Criteria Statements**

Vernal City encourages orderly residential, commercial, industrial and recreational growth and development and will continue to identify areas within the community appropriate for these uses. Vernal City will encourage new growth to take place within or adjacent to developed areas. Vernal City planning personnel will continue to work with Uintah County and neighboring communities to coordinate planning activities and address land uses along jurisdictional boundaries.

Specific criteria that will be addressed with annexation discussions will include:

1. The community character as identified in the Vernal City General Plan.
2. Maintaining the current quality of public services and facilities.
3. Maintaining well-kept residential neighborhoods that provide a variety of housing options and reflect positively on the community's culture and character.
4. The need for expansion of municipal services into the growth area.
5. How the expansion of services into the growth area will be financed.
6. An estimate of the tax consequences will be provided to residents both within the municipal boundary and within the growth area.
7. How effectively does any proposed annexation address the desire of the City to create linear, square boundaries.









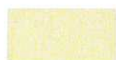
## Mixed Use Areas

This land use category encompasses sites where industrial, commercial and similar uses are located on a single lot. Only 19 acres of this use are located within Vernal City limits. More than 130 Mixed Use acres are located within the Impact Area, primarily on large lots in areas dominated by agricultural land.



## Annex Area

Sometimes referred to as "impact Area"



## Low Density Residential

The bulk of residential uses in Vernal are singlefamily homes located on private lots, with a significantly smaller amount of large-lot (1 acre+) single family uses. To compare, there are nearly three times as many large-lot single family acres in the Impact Area by percentage, and less than half as many single-family acres have been developed.



## Medium Density Residential

multi-family uses in the developed portions of Vernal encompass a range of buildingtypes and forms, including newer duplex, triplex and fourplex units



## High Density Residential

multi-family uses ... tend to encompass a narrow range of uses and forms, such as apartment complexes and condominiums



## Institutional

Nearly 115 acres of land are currently dedicated for schools and educational uses in Vernal, and an additional 75 acres of school land is located within the Impact Area.



## Commercial

In addition to big box and strip commercial along the outskirts of Main Street, a limited number of large and small commercial uses are located elsewhere in the community, particularly north along Vernal Avenue. Typical uses include restaurants, auto service facilities and other commercial uses not requiring marquee locations



## Central Commercial

The area is dominated by Main Street, which is centered on Vernal Avenue. Downtown Vernal includes small eclectic shops, motels, office buildings and similar uses, many of which are locally-owned and operated



## Industrial

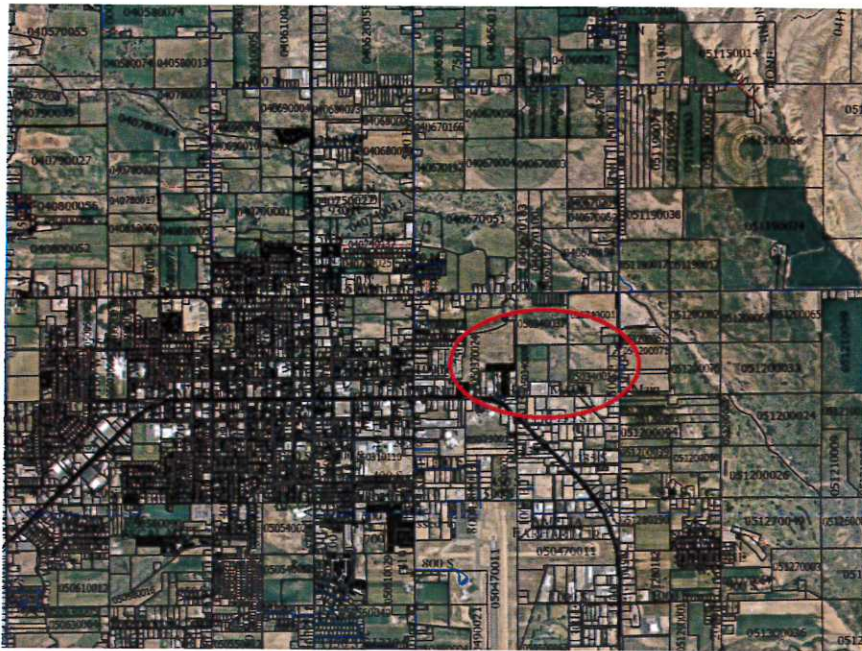
112 acres of industrial land are located in Vernal City, with an additional 39 acres found in the Impact Area. The bulk of Vernal City industries are located on the eastern edge of the community, adjacent to US-40 where the road curves south toward Naples. Typical uses include manufacturing, mining support and agricultural-based industries. The lack of a railroad in the region has significantly restricted the development of industrial uses.



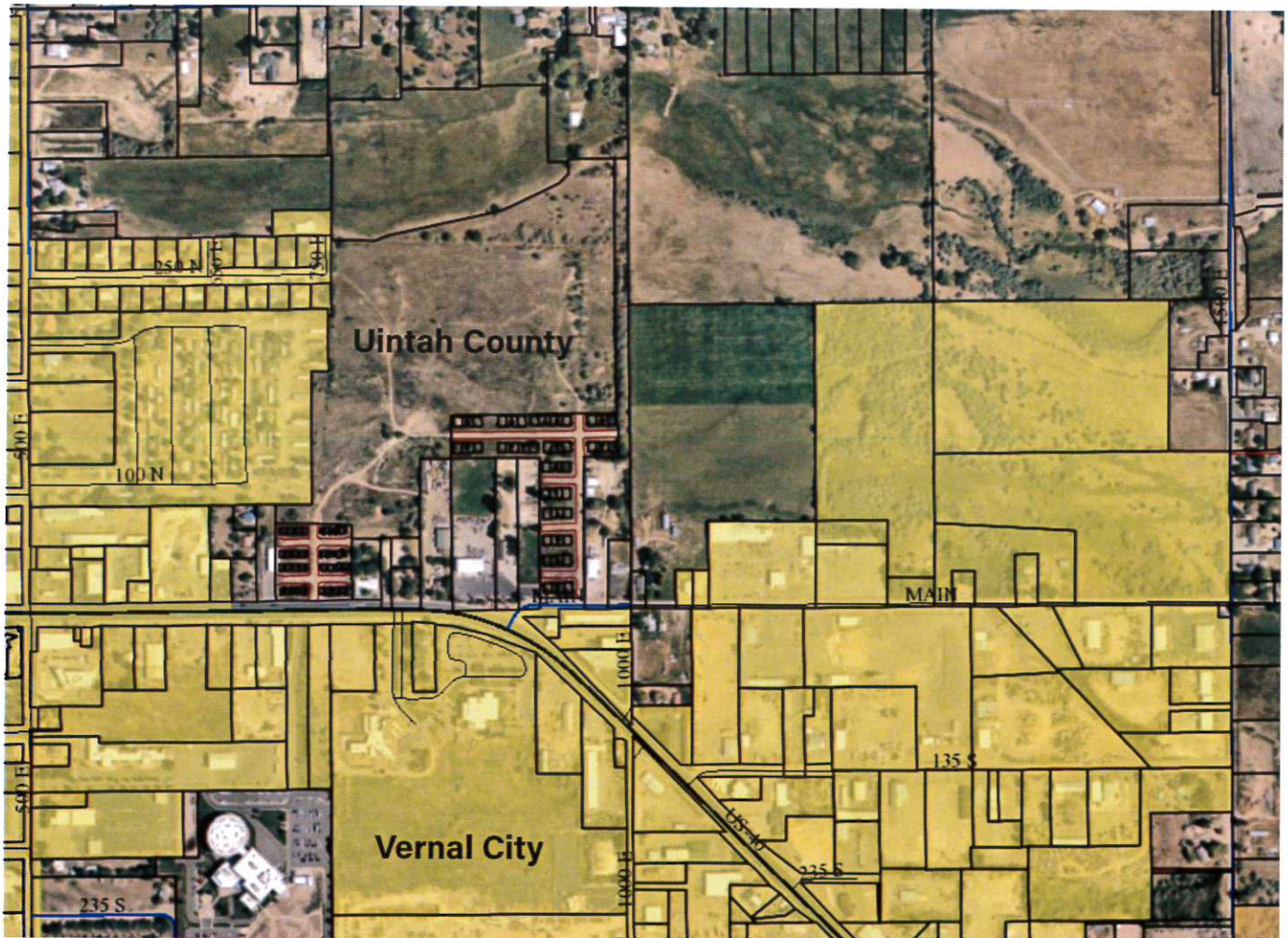
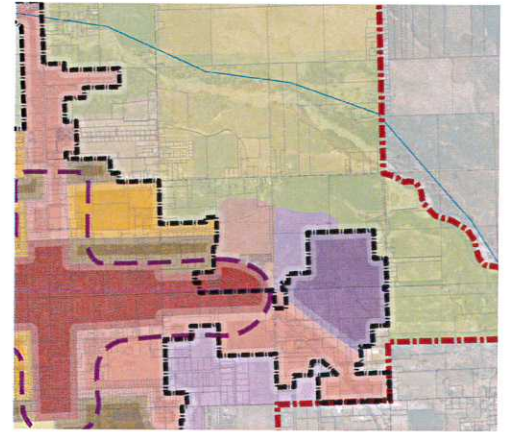
## Transition Areas

outlined in lighter colors

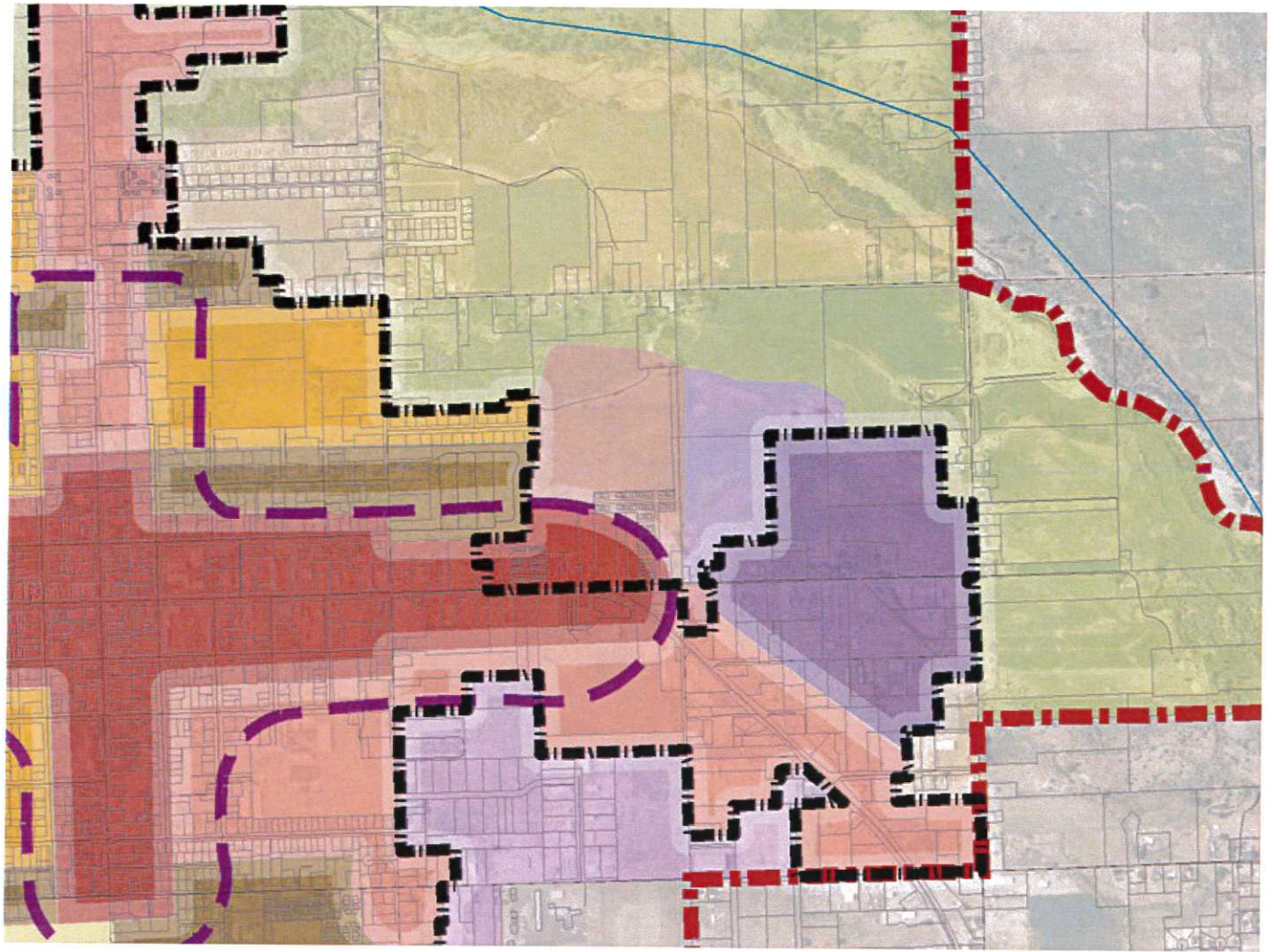




We have Primarily been discussing amending the future land use map in this area. There is the possibility of ammmending more of the map if necessary.







Commercial

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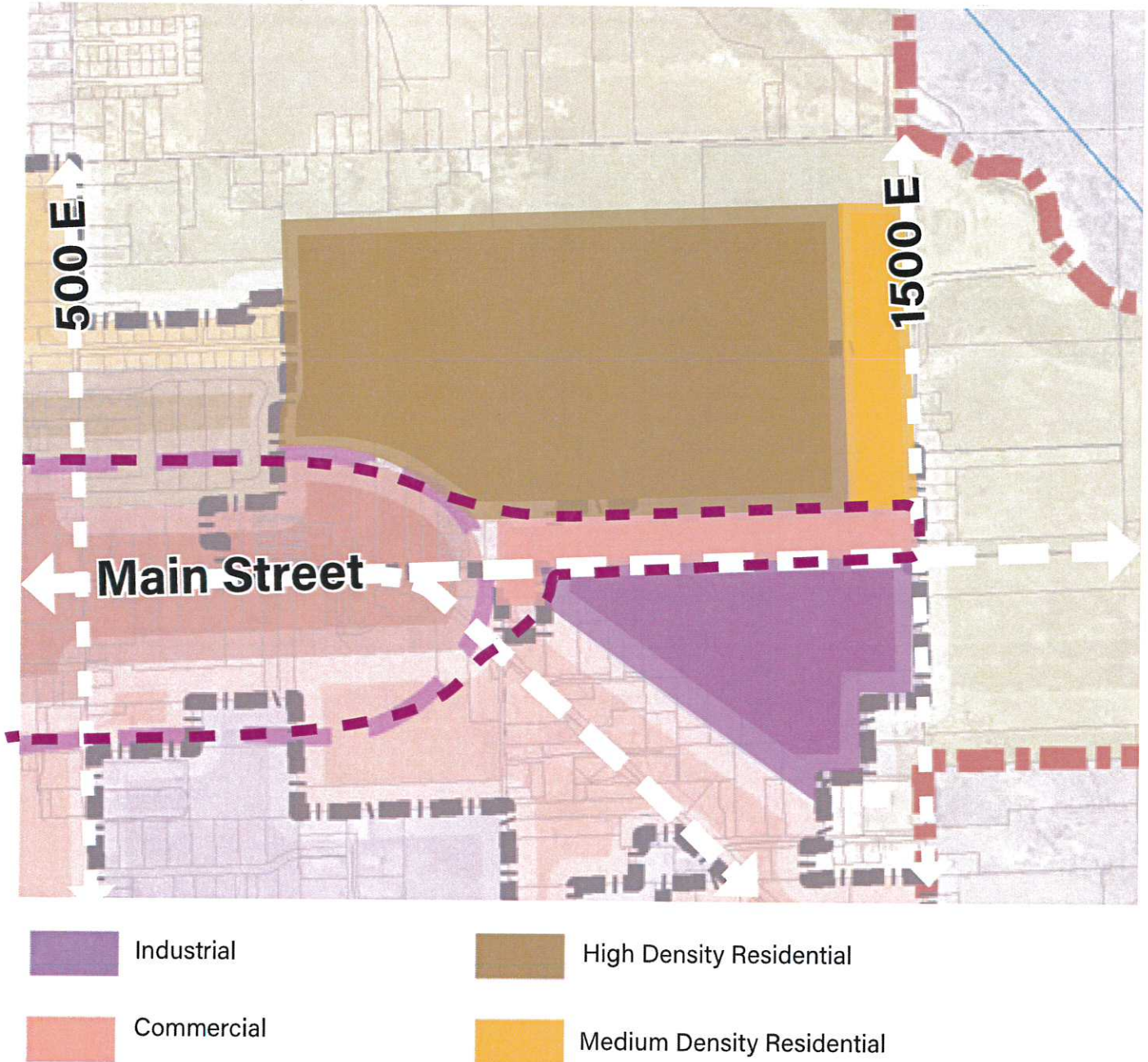


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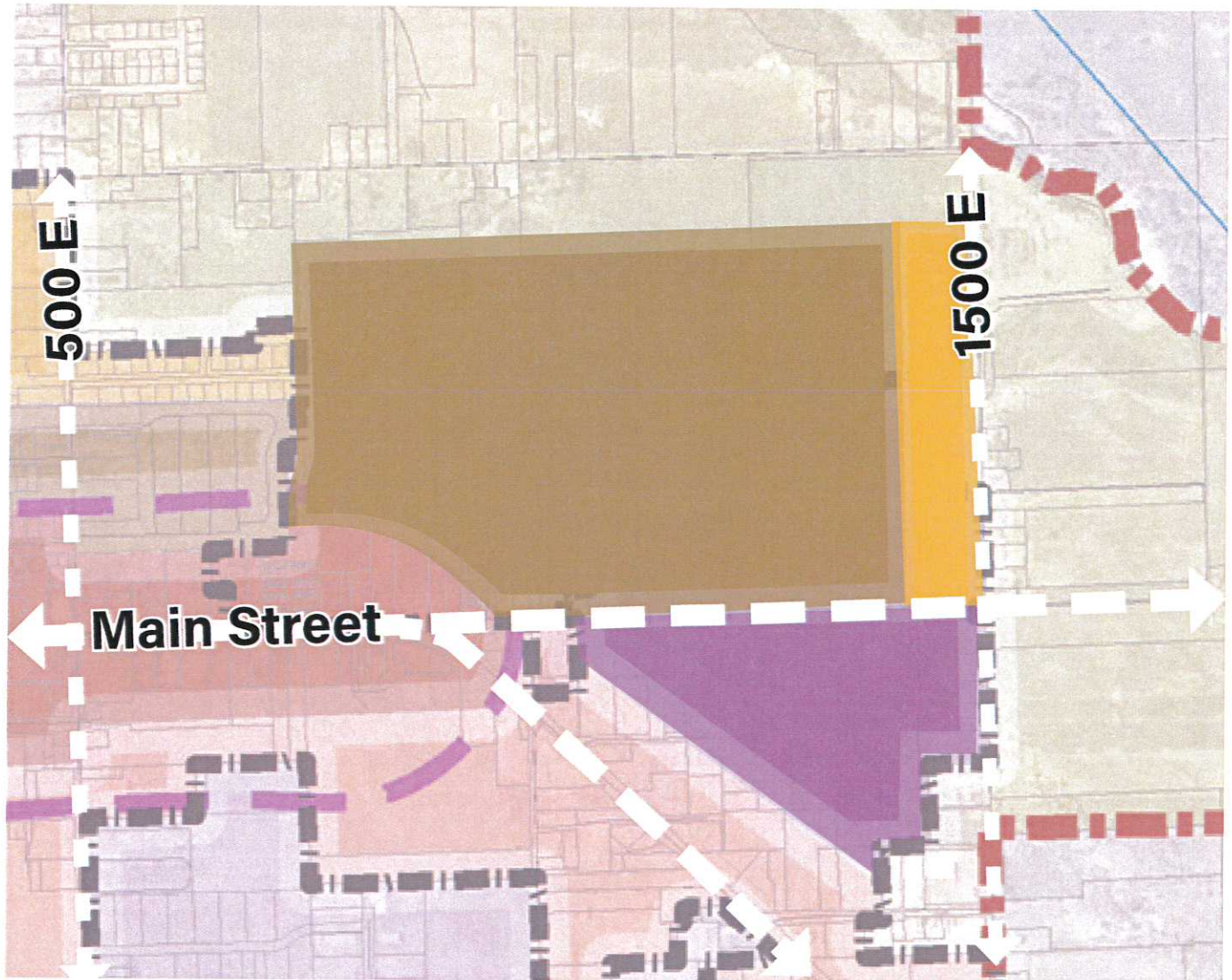
## Option 1



- Industrial stays on the south side of main street
- Commercial buffers industrial to north of main and inbetween industrial and Central Commercial
- High Density Residential north of commercial
- Medium Density Residential buffering High Density and 1500 E
- North of high density residential stays low density residential



## Option 2



- Industrial stays on the south side of main street
- High Density Residential north of commercial
- Medium Density Residential buffering High Density and 1500 E
- North of high density residential stays low density residential